

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

----- x
DYSON TECHNOLOGY LIMITED :
and DYSON, INC., :
: Plaintiffs, : Civil Action No. 05-434-GMS
v. :
: MAYTAG CORPORATION, :
: Defendant. :
----- x

**PLAINTIFFS' OBJECTIONS TO DEFENDANT MAYTAG CORPORATION'S
RULE 30(B)(6) NOTICE OF DEPOSITION**

Plaintiffs Dyson Technology Limited and Dyson, Inc. (collectively “Dyson”), by their attorneys, hereby object to the Rule 30(b)(6) Notice of Deposition served on them by Defendant Maytag Corporation (“Maytag”) on October 4, 2006, on the grounds that the Notice requests an improper contention deposition and that the information sought is more properly obtained through other means. Specifically, the Notice requests that Dyson produce “one or more of their officers, directors, managing agents, employees or other persons” to: (1) state the “bases for Dyson’s contentions that Maytag infringes the patents in-suit” and (2) to answer questions regarding the “damages that Dyson contends it has suffered as a consequence of the purported patent infringements of Hoover.” The information sought in the Notice will be the subject of expert reports served by Dyson and Maytag will have an opportunity to depose Dyson’s experts. Moreover, the Notice seeks deposition testimony regarding the bases for

Dyson's contentions, and such "contention depositions" are viewed unfavorably by this Court.

YOUNG CONAWAY STARGATT & TAYLOR, LLP



C. Barr Flinn (No. 4092)
John W. Shaw (No. 3362)
Adam W. Poff (No. 3990)
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, Delaware 19801
(302) 571-6600
apoff@ycst.com

Attorneys for Plaintiffs

OF COUNSEL

Garrard R. Beeney
Richard C. Pepperman, II
James T. Williams
Keith McKenna
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
(212) 558-4000

Steven F. Reich
Jeffrey S. Edelstein
Tamar Feder
Melissa D. Goetz
Monica Youn
MANATT, PHELPS & PHILLIPS, LLP
7 Times Square
New York, New York 10036
(212) 790-4500

Dated: October 23, 2006

CERTIFICATE OF SERVICE

I, Adam W. Poff, hereby certify that on October 23, 2006, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Francis DiGiovanni, Esquire
CONNOLLY BOVE LODGE & HUTZ LLP
The Nemours Building – 8th Floor
1007 N. Orange Street
Wilmington, Delaware 19801

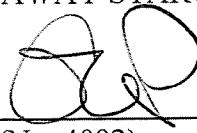
I further certify that on October 23, 2006, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record and on the following in the manner indicated:

BY E-MAIL AND FEDERAL EXPRESS

Ray L. Weber, Esquire
Laura J. Gentilcore, Esquire
RENNER, KENNER, GREIVE, BOBAK,
TAYLOR & WEBER
400 First National Tower
Akron, OH 44308

Kimball R. Anderson, Esquire
Stephen P. Durchslag, Esquire
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60601-9703

YOUNG CONAWAY STARGATT & TAYLOR, LLP



C. Barr Flinn (No. 4092)
John W. Shaw (No. 3362)
Adam W. Poff (No. 3990)
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, Delaware 19801
(302) 571-6600
apoff@ycst.com

*Attorneys for Dyson Technology Limited
and Dyson, Inc.*